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FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

## **Memorandum of Ex Parte Communication**

Ms. Magalie Salas Secretary Federal Communications Commission 1919 M Street, N.W., Room 222 Washington, D.C. 20554

Dear Ms. Salas:

Re: CC Docket No. 96 - 45 - Universal Service

CC Docket No. 97 - 160/— Forward-Looking Mechanism for Non-Rural LECs

On Wednesday, August 19, 1998, representatives of SBC Communications, Inc. ("SBC") met with the Honorable Laska Schoenfelder, Commissioner of the South Dakota Public Utilities Commission and member of the Federal-State Joint Board on Universal Service and Mr. Greg Rislov, Director – Fixed Utilities Division of the South Dakota Public Utilities Commission regarding the above-listed proceedings. Attending on behalf of SBC were Mr. Dale Robertson, Senior Vice President – FCC and Mr. William Sonnett, Director – Industry Affairs.

SBC's position on Universal Service, documented in the record of CC Docket Nos. 96-45 and 97-160, was discussed. Specifically discussed were the deficiencies of the cost models which have been submitted in the FCC's Universal Service proceedings, as well as the FCC's failure to quantify the current implicit and explicit support levels, as required by the Act, prior to developing a mechanism to deal with that support.

We are submitting the original and one copy of this Memorandum to the Secretary in accordance with Section 1.1206(b)(2) of the Commission's rules.

Please stamp and return the provided copy to confirm your receipt. Please contact me at (202) 326-8889 should you have any questions.

Sincerely,

CC:

Commissioner Schoenfelder, Mr. Rislov